



Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
t 212.355.9500
f 212.355.9592

August 13, 2014

Paulina Do Amaral
Partner
pdoamaral@lchb.com

Hon. Frank Maas, United States Magistrate Judge
Chief U.S. Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Hon. Colleen McMahon, United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Confidential

RE: *Addonizio et al v. Simply Thick, L.L.C. et al.*
Civil Action No. 1:12-cv-04448-RA-FM

Dear Judge Maas and Judge McMahon:

We write to provide additional information and context in support of the Parties' request for a stay of the proceedings in the above-entitled matter pending finalization of the settlement process. The resolution of this case is part of an aggregate settlement negotiation which involves minor children and their families residing in various jurisdictions throughout the country. In addition to the above-entitled case pending in this Court, 8 other cases are pending in a Missouri state court in St. Louis County which were filed on behalf of 16 additional minor plaintiffs and/or their families. Nine of the plaintiffs in the Missouri cases are represented by the undersigned counsel and an additional 7 are represented by a separate Plaintiffs' firm.

Before this settlement may be finalized, several steps must occur which may well cause the resolution process to take longer than 30 days. First, the Plaintiffs, 3 defendants and their 8 insurance carriers must agree on the language of a Master Settlement Agreement and a Release. While such efforts are proceeding, a neutral third-party will be called upon to allocate the funds amongst the Plaintiffs. The Plaintiffs also likely will move for establishment of a Qualified Settlement Fund to facilitate and expedite the funding of the resolution. Once the allocations are approved, the Plaintiffs will seek settlement approval as appropriate. Because each step in this process may take some time, the Parties hereby request a stay of the proceedings for 60 days to allow the parties finalize resolution of this matter.

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Should the Court require any additional information, the Parties will gladly provide it. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Paulina do Amaral". The signature is fluid and cursive, with the first name "Paulina" being more prominent.

Paulina do Amaral

cc: All counsel of record by ECF

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